

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

NO. 05 10218 RCL

JESSE WILSON

MOTION TO CONTINUE

NOW COMES the defendant, Jesse Wilson, by and through counsel, and hereby moves this Court to continue his May 9, 2007 sentencing to June 27, 2007 at 2:30 p.m.

In support of this Motion, the accused states as follows:

1. That the defendant is scheduled to appear in this Court on May 9, 2007 for sentencing.
2. However, due to the undersigned counsel's trial schedule in District, Superior and the U.S. District Court, District of New Hampshire (including two recent drug trials) and the undersigned counsel's family vacation, additional time is needed in order to address the defendant's prior convictions. In addition, the pre-sentence investigation report in this matter has not been completed as of this date.
3. Further, the defendant's counsel has two Briefs that are due in the New Hampshire Supreme Court. State v. Abrams is due on April 20, 2007 and State v. Pelletier is due May 7, 2007.
4. The undersigned counsel will be out of State on vacation with his family from April 21 to April 29, 2007.
5. That the United States Attorney's Office assents to the within Motion.
6. That the undersigned counsel has informed the Probation Department of the within Motion.

7. That no Memorandum of Law is necessary.

WHEREFORE, the accused respectfully requests that this Court grant the within Motion.

Respectfully submitted,
Jesse Wilson,
By his Attorney,

Date: April 5, 2007

/S/ Paul J. Garrity
Paul J. Garrity
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Londonderry, NH 03053
(603)434-4106
No. 555976

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 5th day of April, 2007, a copy of the within was e
filed to the United States Attorney's Office and mailed, postage prepaid, to Jesse Wilson.

/S/ Paul J. Garrity
Paul J. Garrity